



MEMO ENDORSED

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January 30, 2007

BY FAX

The Honorable James C. Francis IV
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street - Room 1960
New York, New York 10007-1312

USDC SDNY
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Re: Tikkun v. The City of New York, et al.
(USDC SDNY 05 CV 9901 (KMK) (JCF))

Dear Judge Francis:

I write to request an enlargement of time in the schedule of this case. The current Case Management Order provides that all depositions of fact witnesses shall have been noticed by February 1, 2007. To date, the parties have exchanged written requests for discovery including interrogatories and document requests. Defendants have produced a large volume of documents including plaintiffs' arrest documents and numerous consolidated witnesses for deposition. Approximately 33 additional defense witnesses have been noticed and scheduled for deposition in the consolidated cases in the coming months. Plaintiff and defendants agree, moreover, that this case raises a variety of unique issues that make it more complex than the remainder of the RNC cases. Accordingly, defendants request that the Court grant a 4-month extension on the remaining deadlines in the CMO in this case. I have consulted with plaintiffs' counsel, Andrea Ritchie, and she has advised that she has no objection to the requested extension. If this meets with your approval, would you please "so order" it? Thank you.

Very truly yours,

Application denied. The
deadlines in this case are
already at the outer limit.

James Mirro

cc: Andrea Ritchie, Esq. (by fax)

SO ORDERED,
James C. Francis IV
USMJ